

1 DAVID Z. CHESNOFF, ESQ.

2 *Pro Hac Vice*

3 RICHARD A. SCHONFELD, ESQ.

4 California Bar No. 202182

5 CHESNOFF & SCHONFELD

6 520 South Fourth Street

7 Las Vegas, Nevada 89101

8 Telephone: (702) 384-5563

9 [dzchesnoff@cslawoffice.net](mailto:dzchesnoff@cslawoffice.net)

10 [rschonfeld@cslawoffice.net](mailto:rschonfeld@cslawoffice.net)

11 Attorneys for Defendant ALEXANDER SMIRNOV

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA

14 \* \* \* \* \*

15 UNITED STATES OF AMERICA, ) CASE NO. 2:24-CR-00091-ODW

16 )

17 Plaintiff, )

18 **DEFENDANT'S**

19 **NOTICE OF LODGING**

20 **PROPOSED ORDERS**

21 v. )

22 **DENYING GOVERNMENT'S**

23 **MOTIONS *IN LIMINE***

24 ALEXANDER SMIRNOV, )

25 )

26 **Honorable Otis D. Wright II**

27 Defendant, )

28 **November 25, 2024 at 10:00 a.m.**

29  
30 Comes Now, Defendant Alexander Smirnov, by and through his counsel of  
31 record David Z. Chesnoff, Esq., and Richard A. Schonfeld, Esq., and hereby submits  
32 this Notice of Lodging of Proposed Orders denying the Government's Motions *in*  
33 *Limine* regarding the following:  
34  
35  
36

- 1 1. Government's Motion *in Limine* to Preclude Proposed Defense Expert  
2 Gregory Scott Rogers, *See* ECF No. 150, and Defendant's Opposition to  
3 that Motion, *See* ECF No. 167;
- 4 2. Government's Motion *in Limine* to Exclude the FBI Handling Agent's  
5 Alleged Mistakes, *See* ECF No. 151, and Defendant's Opposition to that  
6 Motion, *See* ECF No. 168;
- 7 3. Government's Motion *In Limine* to Exclude Specific Instances of Conduct,  
8 *See* ECF No. 152, and Defendant's Opposition to that Motion, *See* ECF  
9 No. 169;
- 10 4. Government's Motion *In Limine* to Exclude Alleged Defects in the  
11 Prosecution, *See* ECF No. 153, and Defendant's Opposition to that Motion,  
12 *See* ECF No. 170; and
- 13 5. Government's Motion *in Limine* to Preclude Irrelevant Factual Issues, *See*  
14 ECF No. 154, and Defendant's Opposition to that Motion, *See* ECF No.  
15 171.

16 Dated this 15th day of November, 2024.

17 Respectfully Submitted:

18 CHESNOFF & SCHONFELD

19 /s/ David Z. Chesnoff

20 DAVID Z. CHESNOFF, ESQ.

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22 RICHARD A. SCHONFELD, ESQ.

23 California Bar No. 202182

24 520 South Fourth Street

25 Las Vegas, Nevada 89101

26 Telephone: (702)384-5563

27 dzchesnoff@cslawoffice.net

28 rschonfeld@cslawoffice.net

Attorneys for Defendant

ALEXANDER SMIRNOV

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of November, 2024, I caused the forgoing document to be filed electronically with the Clerk of the Court through the CM/ECF system for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Camie Linnell

Employee of Chesnoff & Schonfeld